

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

THE BOILING POINT, INC. d/b/a/
PEPPERCORNS KITCHEN,

Plaintiff,

v.

NAN LUO aka "JUDY LUO" and FANYUAN
INVESTMENT MANAGEMENT, LLC. d/b/a
PEPPERCORNS KITCHEN,

Defendants.

Case No.

Jury Trial Demanded

DECLARATION OF KEE CHAN

Pursuant to 28 U.S.C. §1746, I, Kee Chan, under penalty of perjury, depose and declare:

1. I originally worked for Keyconcept Design. I have personal knowledge of the facts contained herein.

2. In 2015, I worked with Lili Ma and The Boiling Point, Inc. to design the restaurant's menu, logo, signs, and design concepts.

3. In August of 2015, during a meeting with Ms. Lili Ma about Peppercorns Kitchen, I suggested that Ms. Ma use "peppercorn" as the name of her restaurant because peppercorns symbolized the restaurant's various kinds of spices and food offerings.

4. While I received input from various The Boiling Point, Inc. shareholders, I made the ultimate creative choices regarding Keyconcept Design's final designs for the menu, logo, and restaurant exterior.

I declare under penalty of perjury and upon personal knowledge that the foregoing is true and correct.


Kee Chan


Date